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ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292

Brigette G. McGrath, Esq., NY SBN 4962379

2600 Eagan Woods Drive, Suite 400

St. Paul, MN 55121

Telephone: (651) 289-3857

Fax: (651) 406-9676

Email: bmcgrath@askllp.com

*Counsel for Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Sears Holdings Corporation, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-23538-RDD

(Jointly Administered)

**STIPULATION RESOLVING DEBTORS' OBJECTION TO CLAIMS OF  
ELECTROLUX HOME PRODUCTS, INC.**

Sears, Roebuck and Co., Kmart Holding Corporation, California Builder Appliances, Inc.,  
Florida Builder Appliances, Inc., and StarWest, LLC. (the "Debtors"), each a debtor in the above-  
captioned chapter 11 case, and Electrolux Home Products, Inc. (together with the Debtors, the

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

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“Parties”) through their respective counsel, enter into this *Stipulation Resolving Debtors’ Objection to Claims of Electrolux Home Products, Inc.*

1. On April 10, 2019, Electrolux filed Claim Nos. 16207, 16215, 16441, 16544, 16879, and 17501 (collectively, the “Claims”), asserting a total of \$1,596,872.87 in administrative expense claims (the “Asserted Administrative Claims”) and \$17,427,041.16 in general unsecured claims (the “Asserted General Unsecured Claims”) against the Debtors’ estates.

2. On June 9, 2020, the Debtors filed the *Debtors’ Twentieth Omnibus Objection to Proofs of Claim (Reduced/Reclassified Claims* (ECF No. 8019) (the “Claim Objection”) in which the Debtors objected to allowance of the Asserted Administrative Claims.

3. Following good-faith negotiations, the Debtors and Electrolux have agreed to resolve the Claim Objection as follows:

- a. The Debtors hereby withdraw the Claim Objection with prejudice.
- b. Electrolux shall be deemed to hold: (i) an allowed administrative expense claim entitled to priority under section 503(b)(9) of the Bankruptcy Code in the amount of \$150,000 against each of the Debtors, jointly and severally; and (ii) allowed general unsecured claims against the Debtors specified in the Claims in the total amount of \$18,673,914.03.

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**AGREED TO BY:**

ASK LLP

JENNER & BLOCK LLP

/s/ Joseph L. Steinfeld, Jr.

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292  
Brigette G. McGrath, Esq., NY SBN 4962379  
2600 Eagan Woods Drive, Suite 400  
St. Paul, MN 55121  
Telephone: (651) 289-3857  
Fax: (651) 406-9676  
Email: bmcgrath@askllp.com

/s/ Vincent E. Lazar

Vincent E. Lazar, Esq.  
353 North Clark Street  
Chicago, IL 60654-3456  
Telephone: (312) 923-2989  
Email: vlazar@jenner.com

*Counsel for Defendant*

*-and-*

Edward E. Neiger  
60 East 42<sup>nd</sup> Street, 46<sup>th</sup> Floor  
New York, NY 10165  
Telephone: (212) 267-7342  
Email: eneiger@askllp.com

*Counsel for Debtors*

**SO ORDERED**

Dated: \_\_\_\_\_  
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

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